

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARTWON ROWE-WILLIAMS, )  
Plaintiff, ) Case No: 1:22-CV-04934  
v. )  
BNSF RAILWAY COMPANY, ) Honorable Judge Virginia  
Defendant. ) M. Kendall

**UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE  
RESPONSE TO DEFENDANT'S MOTION TO DISMISS  
PLAINTIFF'S SECOND AMENDED COMPLAINT**

Martwon Rowe-Williams (“Plaintiff”), by and through his attorneys, SULAIMAN LAW GROUP, LTD. moves this Court to extend the deadline for Plaintiff to file their Response to Defendants Motion to Dismiss Plaintiff’s Amend Complaint, and in support thereof, state as follows:

1. On March 28, 2023, Defendant filed their Motion to Dismiss Plaintiff’s Second Amended Complaint with this Honorable Court. [Dkt. No. 43].
2. On March 29, 2023, this Court, entered an order setting the Briefing Schedule as to the Motion to Dismiss, setting Plaintiff’s Response Deadline to April 12, 2023. [Dkt. No. 44].
3. Due to unforeseen circumstances, Plaintiff requests the Responsive Pleading Deadline for Plaintiff be extended to April 19, 2023 and allowing the Defendant’s Reply deadline to be respectively extended seven days to May 3, 2023.

4. Plaintiff's counsel conferred with Defendant's counsel and they are unopposed to this request.

**WHEREFORE**, Plaintiff respectfully requests that this Honorable Court extend the deadline to file their Responsive Pleading documents to April 19, 2023, extend Defendant's Reply deadline to May 3, 2023, and grant any other relief deemed appropriate and equitable.

Dated: April 12, 2023

Respectfully submitted,  
/s/ Alexander J. Taylor

Alexander J. Taylor  
Sulaiman Law Group, Ltd.  
2500 South Highland Avenue  
Suite 200  
Lombard, Illinois 60148  
(630) 575-8181  
ataylor@sulaimanlaw.com  
*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I, Alexander J. Taylor , an attorney, hereby certify that on April 12, 2023 the foregoing Unopposed Motion to Extend Deadline to File Response to Defendant's Motion to Dismiss Plaintiff's First Amended Complaint was filed with the Clerk of the Court of the United States District Court for the Northern District of Illinois by using the CM/ECF system. I certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

*/s/ Alexander J. Taylor*

Alexander J. Taylor  
Sulaiman Law Group, Ltd.  
2500 South Highland Avenue  
Suite 200  
Lombard, Illinois 60148  
(630) 575-8181  
ataylor@sulaimanlaw.com  
*Counsel for Plaintiff*